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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**Related Docket Nos. 1315, 1441, 1454 &  
1545**

**NOTICE OF WITHDRAWAL OF  
THE DEBTORS' TWENTY-THIRD OMNIBUS  
OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS  
PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007  
(NO LIABILITY) SOLELY WITH RESPECT TO CLAIM NO. 353**

**PLEASE TAKE NOTICE** that, on January 19, 2023, Genesis Global Holdco, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* with the United States Bankruptcy Court for the Southern District of New York.

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<sup>1</sup> The Debtors in the above captioned cases (these "Chapter 11 Cases"), along with the last four digits of each Debtor's tax identification number as applicable, are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

**PLEASE TAKE FURTHER NOTICE** that, on or about May 19, 2023, DGR Capital LLC (“DGR”) filed proof of claim number 353 in these Chapter 11 Cases (“Claim No. 353”).

**PLEASE TAKE FURTHER NOTICE** that, on February 15, 2024, the Debtors filed the *Debtors’ Twenty-Third Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (No Liability)* (the “Objection”) (ECF No. 1315) objecting to certain claims, including Claim No. 353.

**PLEASE TAKE FURTHER NOTICE** that, on March 8, 2024, the Debtors filed the *Notice of Presentment of Stipulation By and Among the Debtors and DGR Capital LLC Regarding the Debtors’ Twenty-Third Omnibus Objection (Non-Substantive) to Certain Claims to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (No Liability) and Proposed Order* (the “Stipulation and Order”) (ECF No. 1441).

**PLEASE TAKE FURTHER NOTICE** that, on March 11, 2024, the Debtors filed a *Notice of Adjournment of Debtors’ Twenty-Third Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (No Liability) Solely with Respect to Claim Nos. 223, 353, and 810* (the “Notice of Adjournment”) (ECF No. 1454), adjourning the Objection, solely with respect to certain claims, including Claim No. 353.

**PLEASE TAKE FURTHER NOTICE** that, on April 3, 2024, the Court entered the Stipulation and Order (ECF No. 1545).

**PLEASE TAKE FURTHER NOTICE** that, DGR and the Debtors each having complied with paragraph 2 of the Stipulation and Order, pursuant to paragraph 3 of the Stipulation and Order, the Debtors hereby withdraw with prejudice the Objection solely with respect to Claim No. 353.

Dated: April 11, 2024  
New York, New York

/s/ Luke A. Barefoot  
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